

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

2007 AUG 29 P 1:08

ALONZO MOREFIELD, JR.,)

Plaintiff,)

v.)

GINA SAVAGE, WANDA ROBINSON,)

CAPTAIN B. PALMER-BYRD,)

MS. BROWN, F. DAVIS, P. HARRIS,)

DEPUTY IBIDAPO, DEPUTY FOSTER,)

Defendants.)

Case Number:

DEBRA P. HACKETT, CLK
DISTRICT COURT
MIDDLE DISTRICT ALA

2:07cv780-MHT

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendants Gina Savage, Wanda Robinson, Captain B. Palmer-Byrd, Ms. Brown, F. Davis, P. Harris, Deputy Ibidapo and Deputy Foster, hereby give Notice of Removal of this action from the Circuit Court of Montgomery County, Alabama, to the United States District Court for the Middle District of Alabama, Northern Division, as follows:

Commencement of the Case

1. This action was commenced on June 20, 2007, with the filing of a Summons and Complaint in Civil Action No. CV-07-991, in the Circuit Court of Montgomery County, Alabama. (Exhibit "A")

Jurisdictional Statement

2. In his Complaint, Plaintiff asserts violations of his rights under the First, Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments of the United States Constitution. Pursuant to 28 U.S.C. §1331, this Court would have original jurisdiction over Plaintiff's claims. Plaintiff is an inmate at the Montgomery County Detention

Facility and his claim is also cognizable in this Court pursuant to the Prison Litigation Reform Act, 42 U.S.C § 1997e(a).

Timeliness of Removal

3. Pursuant to 28 U.S.C. §§ 1441 and 1446, the Defendants are timely removing this action from the Circuit Court of Montgomery County, Alabama.

Removal to Middle District of Alabama

4. Removal is proper to the Middle District of Alabama, Northern Division, pursuant to 28 U.S.C. § 81, as Montgomery County is within its boundaries. Pursuant to 28 U.S.C. § 1441, this action is being removed to this Court, which embraces the place where the action is pending in state court.

Attachment of State Court Pleadings and Records

5. Pursuant to Local Rules 3.1 and 81.1, and 28 U.S.C. § 1446, a completed civil cover sheet and clear and legible copies of all pleadings, motions, orders and other papers filed and served in this action are attached as Exhibit "A."

Notice to State Court

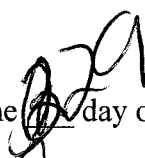
6. Contemporaneously with the filing of this Notice of Removal in this Court, and in accordance with 28 U.S.C. § 1446(d), Defendants have sent written Notice of Removal to Plaintiff at the Montgomery County Detention Facility, Post Office Box 4599, Montgomery, Alabama 36103, and has filed a copy of this Notice with the Clerk of the District Court of Montgomery County, Alabama.

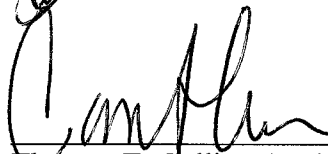
No Admission of Fact or Law

7. No admission of fact, law, or liability is intended by this Notice of Removal, and all defenses, motions, and pleas are expressly reserved.

Conclusion

WHEREFORE, THE PREMISES CONSIDERED, the Defendants respectfully submit that this action should be removed from the Circuit Court of Montgomery County, Alabama to the United States District Court for the Middle District of Alabama, Northern Division.

Respectfully submitted this the  day of August, 2007.



Thomas T. Gallion, III (ASB-5295-L74T)
Constance C. Walker (ASB-5510-L66C)
Attorney for Defendants

OF COUNSEL:

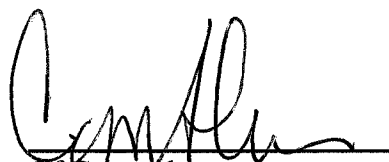
HASKELL SLAUGHTER YOUNG & GALLION, L.L.C.

305 South Lawrence Street
Post Office Box 4660
Montgomery, Alabama 36103-4660
(334) 265-8573
(334) 264-7945 Fax

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the following by causing a true and complete copy of same to be deposited in **the United States Mail**, sufficient first class postage prepaid, on this the 29 day of August, 2007, addressed as follows:

Alonzo Morefield, Jr.
Montgomery County Detention Facility
Post Office Box 4599
Montgomery, Alabama



Of Counsel

27771

State of Alabama
Unified Judicial System**SUMMONS**
- CIVIL -

Case Number

Form C-34 Rev 6/88

CV 07-991

IN THE Circuit COURT OF MONTGOMERY COUNTY
 Plaintiff ALONZO MOREFIELD, JR. v. Defendant GINA SAVAGE, WANDA ROBINSON, CAPT. B. PALMER, BYRD, MS. BROWN, P. HARRIS, F. DAVIS, Deputies I BIDA AND Deputy Foster
INDIVIDUALLY AND IN OFFICIAL CAPACITY
 NOTICE TO MONTGOMERY County Detention Facility, 250 McDONOUGH, Street
MONTGOMERY, AL, 36104

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF OR PLAINTIFF'S ATTORNEY ALONZO MOREFIELD, JR., Pro Se Litigant, Esq. WHOSE ADDRESS IS I.D. No. 479953, GA. ST. PRISON, 301ST Ave Reidsville, GA. 30453

THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN _____ DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED by the Alabama Rules of Civil Procedure:

- ☒ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant.
- ☐ Service by certified mail of this summons is initiated upon the written request of _____ pursuant to the Alabama Rules of Civil Procedure.

Date _____

Clerk/Register

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY
B 2007 JUN 20 PM 2:11

☐ Certified Mail is hereby requested.

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

- ☐ Return receipt of certified mail received in this office on _____ (Date)
- ☐ I certify that I personally delivered a copy of the Summons and Complaint to _____ County, Alabama on _____ (Date)

Date

Server's Signature

Address of Server

Type of Process Server

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

ALONZO MOREFIELD, JR.,
PLAINTIFF,

VS-

GINA SAVAGE, WANDA ROBINSON,
CAPT. B. PALMER-BYRD, MS. BROWN,
F. DAVIS, P. HARRIS, DEPUTY IBIDAPO,
DEPUTY FOSTER,
DEFENDANTS.

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY
CIVIL ACTION NO. 07-991
2007 JUN 20 PM 2:11

DEMAND FOR JURY TRIAL

COMPLAINT

THE ABOVE LISTED DEFENDANTS ARE EMPLOYED AT MONTGOMERY COUNTY DETENTION FACILITY (M.C.D.F.) LOCATED AT 250 McDONOUGH ST. MONTGOMERY, AL. 36104 INVOKING THE JURISDICTION OF THIS COURT. DEFENDANTS ARE SUED INDIVIDUALLY AND IN THEIR OFFICIAL CAPACITY IN VIOLATION OF LOCAL, COUNTY AND STATE LAW, JAIL POLICY AND PROCEDURE AND PRISONERS U.S. CONSTITUTIONAL RIGHTS. THE FOLLOWING ARE ENUMERATED CLAIMS WHICH DETAIL DEFENDANTS LIABILITY IN THIS CASE.

PLAINTIFF WAS INCARCERATED AT M.C.D.F. FROM AUGUST 4, 2004 TO DECEMBER 11, 2004. WHILE A PRISONER AT M.C.D.F. PLAINTIFF WAS SUBJECTED TO ABUSE, DEPRIVATION OF MEDICAL, DENTAL AND MENTAL HEALTH AND INADEQUATE HEALTH CARE. PLAINTIFF WAS ALSO THE VICTIM OF THE FOLLOWING.

1. FROM AUGUST 4, THRU DECEMBER 11, 2004, M.C.D.F. DIRECTOR GINA SAVAGE AND ASSISTANT DIRECTOR WANDA ROBINSON DEPRIVED PLAINTIFF ACCESS TO HIS LEGAL DOCUMENTS IN HIS PROPERTY BY NOT ALLOWING HIM TO POSSESS SAID DOCUMENTS IN HIS CELL WHICH EFFECTED THE PREPARATION OF HIS CRIMINAL CASE AND CAUSED IRREPARABLE HARM IN THE SUBSEQUENT CONVICTION IN CASE NO. CC-2004-1043, 1044, 1045. THIS IS DEPRIVATION OF ACCESS TO COURT.
2. ON DECEMBER 1, 2004, M.C.D.F. ASST. DIRECTOR WANDA ROBINSON DEPRIVED PLAINTIFF OF M.C.D.F. GRIEVANCE PROCEDURE IN A WRITTEN LETTER TO PLAINTIFF, CAUSING PLAINTIFF TO SUFFER HARM AT HANDS OF JAIL STAFF.
3. FROM AUG. 4, THRU DEC. 11, 2004 DEFENDANTS GINA SAVAGE AND WANDA ROBINSON EMPLOYED SUSTAINED SEGREGATION FOR PLAINTIFFS ENTIRE STAY AT M.C.D.F. FOR UNKNOWN REASONS. PLAINTIFF WAS NOT A DISCIPLINARY PROBLEM THUS SEGREGATION WAS UNJUSTIFIED, UNWARRANTED AND PREJUDICIAL. THIS OBSTRUCTED MOREFIELD FROM PARTICIPATING IN SOCIAL GROUP INCLUDING CHURCH SERVICES.
4. FROM AUG. 4, THRU DEC. 11, 2004, CAPTAIN B. PALMER-BYRD, DIRECTOR OF MEDICAL, DENTAL AND MENTAL HEALTH DIVISION AT M.C.D.F. PLAINTIFF WAS DEPRIVED OF: A) MEDICAL, MENTAL HEALTH INTAKE SCREENING B) TREATMENT FOR CHRONIC CHOLESTEROL, HYPERTENSION, SINUS ALLERGY ILLNESS C) TESTING FOR COMMUNICABLE DISEASES INCLUDING STD'S, TUBERCULOSIS D) DENTAL CARE E) M.C.D.F. HAS NO 24 HOUR EMERGENCY MEDICAL CARE F) NO MENTAL HEALTH CARE.

5. FROM AUG. 4, THRU DEC. 1, 2004, F. DAVIS AND P. HARRIS, GRIEVANCE AND LIBRARY CLERKS, COLLECTIVELY FAILED TO INVESTIGATE, PROCESS, REPLY OR RECOMMEND CORRECTIVE ACTION AGAINST MCDF STAFF FROM MISCONDUCT FROM GRIEVANCES FILED, FURTHER DEPRIVING PLAINTIFF ACCESS TO COURT BY ONLY ALLOWING PLAINTIFF A UNREASONABLE 15-30 MINUTES PER WEEK OF LAW LIBRARY TO DO LAW WORK.
6. FROM AUG. 4, THRU DEC. 11, 2004, MCDF MAIL CLERK MS. BROWN BLATENTLY AND INTENTIONALLY FAILED TO PROPERLY DELIVER INCOMING U.S. MAIL INCLUDING LEGAL MAIL TO PLAINTIFF BY LEAVING MAIL IN FLOOR CONTROL BOOTH FOR DEPUTIES TO DISTRIBUTE WHICH VIOLATES JAIL POLICY. PLAINTIFFS LEGAL MAIL WAS OPENED PRIOR TO DELIVERY AND OUTSIDE PRESENCE OF PLAINTIFF.
7. ON NOVEMBER 23, 2004, PLAINTIFF WAS GIVEN THE WRONG DIET TRAY BY MCDF DEPUTY IBIDAPO. A TRAY WITH PLAINTIFFS NAME ON IT WAS NOT ISSUED PER JAIL POLICY. WHEN PLAINTIFF COMPLAINED, DEPUTY IBIDAPO AND DEPUTY FOSTER PHYSICALLY ASSAULTED PLAINTIFF BY STRIKING HIM IN THE FACE, CHEST, ARMS, STOMACH, WITH CLOSED FIST. PLAINTIFF WAS NOT TAKEN TO MEDICAL OR NOT ALLOWED TO HAVE A USE OF FORCE EXAM OR FILE A GRIEVANCE.

SUMMARY OF VIOLATIONS

ACTIONS BY DEFENDANTS ARE IN VIOLATION OF ALABAMA RULES OF CIVIL PROCEDURE, AMERICAN CORRECTIONAL ASSOCIATION STANDARDS ON JAIL OPERATION, NATIONAL COMMISSION ON CORRECTIONAL HEALTH CARE, NATIONAL INSTITUTE OF OCCUPATIONS, SAFETY AND HEALTH. PLAINTIFF REQUESTS THIS COURT TO APPOINT A CORRECTIONAL EXPERT TO AUDIT ALL ASPECTS OF JAIL OPERATION, INVESTIGATE ALL ALLEGATIONS. THE CORRECTIONAL EXPERT SHALL REVIEW ALL STAFF INCIDENT REPORTS, INMATE GRIEVANCES, REPORTS GENERATED BY MCDF GRIEVANCE COMMITTEE, TOWER, DORM LOG BOOKS, BOOKING PROCEDURES, INTERVIEW PLAINTIFF AND ANY CURRENT OR PAST PRISONERS, REVIEW EXCESSIVE FORCE POLICIES AND ALL CURRENT AND PRIOR COMPLAINTS BY PLAINTIFF AND CURRENT AND PRIOR PRISONERS AT MCDF. COMPLETE A INVESTIGATION AND FILE A REPORT WITH FINDINGS WITH THE COURT FOR REVIEW.

DEFENDANTS HAVE VIOLATED PLAINTIFFS PRISONER RIGHTS, LOCAL, COUNTY AND STATE OF ALABAMA LAWS AND PLAINTIFFS U.S. CONSTITUTIONAL RIGHTS.

CLAIM 1: DEFENDANTS SAVAGE AND ROBINSON VIOLATED ALABAMA LAW, JAIL POLICY AND PRISONERS U.S. CONSTITUTIONAL RIGHTS OF 1ST, 4TH, 5TH, 6TH, 8TH AND 14TH AMENDMENT RIGHTS, PLAINTIFFS RIGHTS.

CLAIM 2: DEFENDANT ROBINSON VIOLATED ALABAMA LAW, JAIL POLICY AND PRISONERS/PLAINTIFFS 1ST, 5TH, 8TH, AND 14TH AMENDMENT RIGHTS.

CLAIM 3: DEFENDANTS SAVAGE AND ROBINSON VIOLATED JAIL POLICY, ALABAMA LAW AND PLAINTIFFS 1ST, 5TH, 6TH, 8TH AND 14TH U.S. CONSTITUTIONAL RIGHTS.

CLAIM 4: DEFENDANT BYRD VIOLATED JAIL POLICY, ALABAMA LAW AND PLAINTIFFS 5TH, 8TH AND 14TH AMENDMENT RIGHTS.

CLAIM 5: DEFENDANT DAVIS AND HARRIS VIOLATED JAIL POLICY, ALABAMA LAW AND PLAINTIFFS 1ST, 5TH, 6TH, 8TH AND 14TH U.S. CONSTITUTIONAL RIGHTS.

CLAIM 6: DEFENDANT BROWN VIOLATED JAIL POLICY, ALABAMA LAW, AND PLAINTIFFS 5TH, 8TH, AND 14TH AMENDMENT RIGHTS.

CLAIM 7: DEFENDANTS IBIDAPO AND FOSTER VIOLATED JAIL POLICY, ALABAMA LAW AND PLAINTIFFS 5TH, 8TH, AND 14TH AMENDMENT RIGHTS.

RELIEF SOUGHT

PLAINTIFF SEEKS MONETARY RELIEF FOR ATTORNEY FEES IN AMOUNT OF \$45.00 PER HOUR, EVERY HOUR PLAINTIFF SPENT WORKING ON THIS CASE, A TOTAL AMOUNT OF HOURS WILL BE CITED IN A SEPARATE FILING.
 PLAINTIFF SEEKS COMPENSATORY DAMAGES AGAINST EACH DEFENDANT FOR BIAS/INT, INTENTIONAL VIOLATIONS OF MOREFIELD'S RIGHTS AND MENTAL ANGUISH. THE AMOUNT OF DAMAGES ARE TO BE ASSESSED BY A JURY AFTER EVALUATING THE CONSTITUTIONAL VIOLATIONS AND HARM CAUSED TO PLAINTIFF.

PLAINTIFF SEEKS PUNITIVE DAMAGES AS FOLLOWS:

- CLAIM 1 - GINA SAVAGE IN AMOUNT OF \$50,000.00
- CLAIM 2 - WANDA ROBINSON IN AMOUNT OF 50,000.00
- CLAIM 2 - WANDA ROBINSON IN AMOUNT OF 25,000.00
- CLAIM 3 - GINA SAVAGE IN AMOUNT OF 50,000.00
- CLAIM 3 - WANDA ROBINSON IN AMOUNT OF 50,000.00
- CLAIM 4 - CAPTAIN B. PALMER - BYRD IN AMOUNT OF 100,000.00
- CLAIM 5 - F. DAVIS IN AMOUNT OF 25,000.00
- CLAIM 5 - P. HARRIS IN AMOUNT OF 25,000.00
- CLAIM 6 - MS. BROWN IN AMOUNT OF 50,000.00
- CLAIM 7 - DEPUTY IBIDALO IN AMOUNT OF 100,000.00
- CLAIM 7 - DEPUTY FOSTER IN AMOUNT OF 100,000.00

Respectfully Submitted
 Alanzo Morefield, Jr.,
 PLAINTIFF, PRO SE

by: 

CERTIFICATE OF SERVICE

THIS WILL CERTIFY THAT A COPY OF THIS COMPLAINT WAS SERVED ON ALL LISTED DEFENDANTS IN THIS ACTION BY U.S. MAIL OR HAND DELIVERY VIA MONTGOMERY COUNTY CIRCUIT COVER CLERK POSTAGE PAID THEREON ADDRESSED TO: ALL NAMED DEFENDANTS AT MONTGOMERY COUNTY DETENTION FACILITY, 250 McDONOUGH STREET, MONTGOMERY, ALABAMA 36104 THIS 21st DAY OF MAY, 2007.



ALONZO MOREFIELD, JR.
I.D. NO. 479955

GEORGIA STATE PRISON
300 FIRST AVE
REIDSVILLE, GA. 30453

CUSTODIAL AUTHORITY

GEORGIA DEPT. OF CORRECTIONS
c/o GEORGIA STATE PRISON

ATTN: STEPHEN UPTON, WARDEN
300 FIRST AVE
REIDSVILLE, GA. 30453
(912) 557-7301

ALONZO MOREFIELD, JR.,
 PLAINTIFF,

VS -

GINA SAVAGE, WANDA ROBINSON,
 CAPT. B. PALMER-BYRD, MS. BROWN,
 F. DAVIS, P. HARRIS, OFFICER IBIDAPO,
 OFFICER FOSTER, INDIVIDUALLY AND IN
 OFFICIAL CAPACITY,
 DEFENDANTS.

* CIVIL ACTION NO.: 07-991
 *
 *
 *
 *
 *

MOTION FOR APPOINTMENT OF COUNSEL

PLAINTIFF MOVES THIS COURT IN ABOVE STYLED CASE FOR A ORDER APPOINTING A QUALIFIED, TRAINED LAWYER TO REPRESENT HIM IN THIS CASE. ORDINARY APPOINTMENT OF COUNSEL IN A CIVIL ACTION IS NOT MANDATED BY ALA LAW OR 6th AMENDMENT. HOWEVER TO PREVENT A MISCARriage OF JUSTICE APPOINTMENT OF COUNSEL IS NECESSARY. PLAINTIFF FURTHER SAYS THE FOLLOWING:

1. PLAINTIFF IS IN THE CUSTODY OF THE GEORGIA DEPARTMENT OF CORRECTIONS (GDC) LITIGATING THIS CASE FROM ANOTHER STATE.
2. PLAINTIFF HAS NO ACCESS TO ALABAMA LAW BOOKS, ALABAMA CASE LAW OR ALABAMA LEGAL FILING MATERIALS.
3. AT PLAINTIFFS FACILITY HIS LAW LIBRARY TIME IS SEVERELY RESTRICTED.
4. PLAINTIFF'S LIKELIHOOD OF SUCCESS ON THE MERITS IN THIS CASE IS FAVORABLE
5. PLAINTIFF IS NOT A LAWYER AND NOT GRANTING COUNSEL REPRESENTATION WOULD BE A BLATANT MISCARriage OF JUSTICE.

WHEREFORE, PLAINTIFFS ASK THIS COURT TO GRANT A ORDER APPOINTING COUNSEL IN THIS CASE OR HOLD A HEARING TO HEAR ORAL ARGUMENTS ON THIS MOTION PURSUANT TO ALABAMA LAW.

RESPECTFULLY SUBMITTED,

ALONZO MOREFIELD, JR.
 PLAINTIFF, PRO SE

by:




CERTIFICATE OF SERVICE

THIS WILL CERTIFY THAT A COPY OF THIS COMPLAINT WAS SERVED ON ALL LISTED DEFENDANTS IN THIS ACTION BY U.S. MAIL OR HAND DELIVERY VIA MONTGOMERY COUNTY CIRCUIT COURT CLERK POSTAGE PAID THEREON ADDRESSED TO: ALL NAMED DEFENDANTS AT MONTGOMERY COUNTY DETENTION FACILITY, 250 MCDONOUGH STREET, MONTGOMERY, ALABAMA 36104 THIS 21ST DAY OF MAY, 2007.

CUSTODIAL AUTHORITY

GEORGIA DEPT. OF CORRECTIONS
c/o GEORGIA STATE PRISON
ATTN: STEPHEN UPTON, WARDEN
300 FIRST AVE
REIDSVILLE, GA. 30453
(912) 557-7301


ALONZO MOREFIELD, JR.
I.D. NO. 479955
GEORGIA STATE PRISON
300 FIRST AVE
REIDSVILLE, GA. 30453

ALONZO MOREFIELD, JR.,
 PLAINTIFF,

* CIVIL ACTION NO.: 07-991
 *

VS -

GINA SAVAGE, WANDA ROBINSON,
 CAPT. B. PALMER-BYRD, M.S. BROWN,
 F. DAVIS, P. HARRIS, OFFICER IBIDAPO,
 OFFICER FOSTER, INDIVIDUALLY AND IN
 OFFICIAL CAPACITY,
 DEFENDANTS.

*
 *
 *
 *

MOTION FOR APPOINTMENT OF COUNSEL

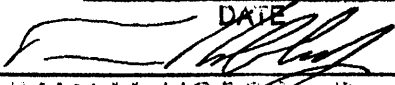
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3. AT PLAINTIFFS FACILITY HIS LAW LIBRARY TIME IS SEVERELY RESTRICTED.
4. PLAINTIFF'S LIKELIHOOD OF SUCCESS ON THE MERITS IN THIS CASE IS FAVORABLE
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Respectfully Submitted,
 ALONZO MOREFIELD, JR.
 PLAINTIFF, PRO SE

by: 

DENIED 6-26-07
 DATE

 T. J. MOORE, JR.
 CIRCUIT JUDGE

FILED
 CIRCUIT COURT OF
 MONTGOMERY COUNTY
 2007 JUN 27 PM 2:59

State of Alabama
Unified Judicial System

Form C-10 (front) Rev. 8/92

AFFIDAVIT of SUBSTANTIAL HARDSHIP and ORDER

Case Number

CV 07-991

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY

☒ STATE OF ALABAMA ☐ MUNICIPALITY OF _____
v. SINA SAYAGE, WANDA ROBINSON, CAPT. B. PALMER-BYRD, MS. BROWN, R. HARRIS
F. DAVIS, Deputy Jailor and Deputy Foster, Defendant

TYPE OF PROCEEDING: _____ CHARGE: VIOLATION OF MCDP Policy, ALABAMA
LAW AND U.S. CONSTITUTIONAL RIGHTS

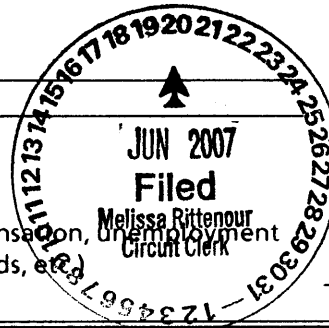
- ☒ CIVIL CASE- I, because of substantial hardship, am unable to pay the docket fee and service fees in this case. I request that payment of these fees be waived initially and taxed as costs at the conclusion of the case.
- ☐ CIVIL CASE (such as paternity, support, termination of parental rights, dependency) - I request an attorney be appointed for me.
- ☐ CRIMINAL CASE--I am financially unable to hire an attorney and request that the Court appoint one for me.
- ☐ DELINQUENCY/NEED OF SUPERVISION - I am financially unable to hire an attorney and request that the Court appoint one for my child.

AFFIDAVIT

- A. Do you have a job or work for yourself? ☐ Yes ☒ No
Employer's name and address N/A
How much money do you take home each week? + \$ N/A.
- B. If unemployed, give month and year of last employment and amount earned per month NEVER HAD LEGAL EMPLOYMENT \$ N/A
- C. Does your husband or wife have a job? ☐ Yes ☒ No
Employer's name and address N/A
How much money does he/she take home each week? + \$ N/A
- D. Do you receive money or benefits from any other source?
(Example: retirement pay, social security, workmen's compensation, unemployment compensation, food stamps, rent payments, interest, dividends, etc.) ☐ Yes ☒ No
How much do you receive each month? + \$ N/A.

- A. Do you have any money in any bank, savings and loan, credit union, or any other place, including cash on hand? ☐ Yes ☒ No
Where? NONE How much? + \$ 0.00
- B. Do you own anything else of value? (Land, house, boat, television, stereo, jewelry, car, truck, van, stocks, bonds, etc.) ☐ Yes ☒ No
What? N/A
Total Value + \$ 0.00

- A. Are you: ☒ Single ☐ Married ☐ Widowed ☐ Divorced ☐ Separated?
- B. Do you have any dependents? ☐ Yes ☒ No
Who and what relationship? N/A



AVSO350

ALABAMA JUDICIAL DATA CENTER
MONTGOMERY COUNTY

SUMMONS

CV 2007 000991.00

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY

ALONZO MOREFIELD JR. VS. GINA SAVAGE, ET AL

SERVE ON: (D001)

SSN: 000-00-0000

SAVAGE GINA
250 MCDONOGH ST

MONTGOMERY, AL 36104-0000

PLAINTIFF'S ATTORNEY

*** PRO SE ***

TO THE ABOVE NAMED DEFENDANT:

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS, YOU OR YOUR ATTORNEY ARE REQUIRED TO MAIL OR HAND DELIVER A COPY OF A WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT TO THE PLAINTIFFS ATTORNEY(S) SHOWN ABOVE OR ATTACHED:

THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGEMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. YOU MUST ALSO FILE THE ORIGINAL OF YOUR ANSWER WITH THE CLERK OF THIS COURT.

(✓) TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY EITHER RULES 4.1(B)(2) OR 4.2(B)(2) OR 4.4(B)(2) OF THE ALABAMA RULES OF CIVIL PROCEDURE: YOU ARE HEREBY COMMANDED TO SERVE THIS SUMMONS AND A COPY OF THE COMPLAINT IN THIS ACTION UPON DEFENDANT.

() THIS SERVICE BY CERTIFIED MAIL OF THIS SUMMONS IS INITIATED UPON THE WRITTEN REQUEST OF _____ PURSUANT TO RULE 4.1(C) OF THE ALABAMA RULES OF CIVIL PROCEDURE.

DATE: 07/23/2007

CLERK: MELISSA RITTENOUR
P O BOX 1667
MONTGOMERY AL 36102-1667
(334) 832-1266

RETURN ON SERVICE:

() CERTIFIED MAIL RETURN RECEIPT IN THIS OFFICE ON (DATE) _____
(RETURN RECEIPT HERETO ATTACHED)

() I CERTIFY THAT I PERSONALLY DELIVERED A COPY OF THE SUMMONS AND COMPLAINT TO _____
IN _____ COUNTY, ALABAMA ON (DATE) _____

DATE _____ SERVER SIGNATURE _____

SERVER ADDRESS _____ TYPE OF PROCESS SERVER _____

OPERATOR: LAW
PREPARED: 07/23/2007

AVSO350

ALABAMA JUDICIAL DATA CENTER
MONTGOMERY COUNTY

SUMMONS

CV 2007 000991.00

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY

ALONZO MOREFIELD JR. VS. GINA SAVAGE, ET AL

SERVE ON: (D002)

SSN: 000-00-0000

ROBINSON WANDA
250 MCDONOGH ST

PLAINTIFF'S ATTORNEY

*** PRO SE ***

MONTGOMERY, AL 36104-0000

TO THE ABOVE NAMED DEFENDANT:

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- () THIS SERVICE BY CERTIFIED MAIL OF THIS SUMMONS IS INITIATED UPON THE WRITTEN REQUEST OF _____ PURSUANT TO RULE 4.1(C) OF THE ALABAMA RULES OF CIVIL PROCEDURE.

DATE: 07/23/2007

CLERK: MELISSA RITTENOUR
P O BOX 1667
MONTGOMERY AL 36102-1667
(334) 832-1266

RETURN ON SERVICE:

- () CERTIFIED MAIL RETURN RECEIPT IN THIS OFFICE ON (DATE) _____
(RETURN RECEIPT HERETO ATTACHED)
- () I CERTIFY THAT I PERSONALLY DELIVERED A COPY OF THE SUMMONS AND COMPLAINT TO _____
IN _____ COUNTY, ALABAMA ON (DATE) _____

DATE

SERVER SIGNATURE

SERVER ADDRESS

TYPE OF PROCESS SERVER

OPERATOR: LAW
PREPARED: 07/23/2007

AVSO350

ALABAMA JUDICIAL DATA CENTER
MONTGOMERY COUNTY

SUMMONS

CV 2007 000991.00

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY

ALONZO MOREFIELD JR. VS. GINA SAVAGE, ET AL

SERVE ON: (D003)

SSN: 000-00-0000

PLAINTIFF'S ATTORNEY

BYRD CAPT. B PALMER
250 MCDONOGH ST

*** PRO SE ***

MONTGOMERY, AL 36104-0000

TO THE ABOVE NAMED DEFENDANT:

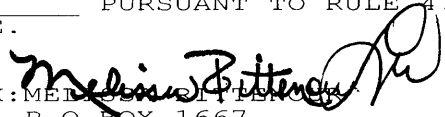
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS, YOU OR YOUR ATTORNEY ARE REQUIRED TO MAIL OR HAND DELIVER A COPY OF A WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT TO THE PLAINTIFFS ATTORNEY(S) SHOWN ABOVE OR ATTACHED:

THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGEMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. YOU MUST ALSO FILE THE ORIGINAL OF YOUR ANSWER WITH THE CLERK OF THIS COURT.

✓ TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY EITHER RULES 4.1(B)(2) OR 4.2(B)(2) OR 4.4(B)(2) OF THE ALABAMA RULES OF CIVIL PROCEDURE: YOU ARE HEREBY COMMANDED TO SERVE THIS SUMMONS AND A COPY OF THE COMPLAINT IN THIS ACTION UPON DEFENDANT.

() THIS SERVICE BY CERTIFIED MAIL OF THIS SUMMONS IS INITIATED UPON THE WRITTEN REQUEST OF _____ PURSUANT TO RULE 4.1(C) OF THE ALABAMA RULES OF CIVIL PROCEDURE.

DATE: 07/23/2007

CLERK: 
P O BOX 1667
MONTGOMERY AL 36102-1667
(334)832-1266

RETURN ON SERVICE:

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TYPE OF PROCESS SERVER

OPERATOR: LAW
PREPARED: 07/23/2007

AVSO350

ALABAMA JUDICIAL DATA CENTER
MONTGOMERY COUNTY

SUMMONS

CV 2007 000991.00

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY

ALONZO MOREFIELD JR. VS. GINA SAVAGE, ET AL

SERVE ON: (D004)

SSN: 000-00-0000

PLAINTIFF'S ATTORNEY

MRS. BROWN
250 MCDONOGH ST

*** PRO SE ***

MONTGOMERY, AL 36104-0000

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DATE: 07/23/2007

CLERK: MELISSA RITTENOUR
P O BOX 1667
MONTGOMERY AL 36102-1667
(334) 832-1266

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TYPE OF PROCESS SERVER

OPERATOR: LAW
PREPARED: 07/23/2007

AVSO350

ALABAMA JUDICIAL DATA CENTER
MONTGOMERY COUNTY

SUMMONS

CV 2007 000991.00

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY

ALONZO MOREFIELD JR. VS. GINA SAVAGE, ET AL

SERVE ON: (D005)

SSN: 000-00-0000

PLAINTIFF'S ATTORNEY

F. DAVIS
250 MCDONOGH ST

*** PRO SE ***

MONTGOMERY, AL 36104-0000

TO THE ABOVE NAMED DEFENDANT:

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DATE: 07/23/2007

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TYPE OF PROCESS SERVER

OPERATOR: LAW
PREPARED: 07/23/2007

AVSO350

ALABAMA JUDICIAL DATA CENTER
MONTGOMERY COUNTY

SUMMONS

CV 2007 000991.00

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY

ALONZO MOREFIELD JR. VS. GINA SAVAGE, ET AL

SERVE ON: (D006)

SSN: 000-00-0000

PLAINTIFF'S ATTORNEY

P. HARRIS
250 MCDONOGH ST

*** PRO SE ***

MONTGOMERY, AL 36104-0000

TO THE ABOVE NAMED DEFENDANT:

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DATE: 07/23/2007

Melissa Pittenour
CLERK: MELISSA RITTENOUR
P O BOX 1667
MONTGOMERY AL 36102-1667
(334)832-1266

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DATE

SERVER SIGNATURE

SERVER ADDRESS

TYPE OF PROCESS SERVER

OPERATOR: LAW

PREPARED: 07/23/2007

AVSO350

ALABAMA JUDICIAL DATA CENTER
MONTGOMERY COUNTY

SUMMONS

CV 2007 000991.00

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY

ALONZO MOREFIELD JR. VS. GINA SAVAGE, ET AL

SERVE ON: (D007)

SSN: 000-00-0000

PLAINTIFF'S ATTORNEY

DEPUTY IBIDAPO
250 MCDONOGH ST

*** PRO SE ***

MONTGOMERY, AL 36104-0000

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MONTGOMERY AL 36102-1667
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MONTGOMERY COUNTY

SUMMONS

CV 2007 000991.00

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY

ALONZO MOREFIELD JR. VS. GINA SAVAGE, ET AL

SERVE ON: (D008)

SSN: 000-00-0000

PLAINTIFF'S ATTORNEY

DEPUTY FOSTER
250 MCDONOGH ST

*** PRO SE ***

MONTGOMERY, AL 36104-0000

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SERVER SIGNATURE

SERVER ADDRESS

TYPE OF PROCESS SERVER

OPERATOR: LAW

PREPARED: 07/23/2007

ALONZO MOREFIELD, JR.
479955, 100 FIRST AVE
% GEORGIA STATE PRISON
Reidsville, GA. 30453

MELISSA RITTENOUR, Clerk/ Register
Circuit Court Montbomery County
P.O. Box 1667
MONTBOMERY, AL. 36102-1667

APRIL 20, 2007

DEAR CLERK'S OFFICE:

PLEASE SEND ME ALL CIVIL ACTION FORMS NEEDED TO
FILE A LEGAL MALPRACTICE LAW SUIT.

ALSO SEND ME THE ADDRESS FOR THE STATE RISK
MANAGEMENT AGENCY FOR TORTS.

PLEASE FORWARD TO MY ABOVE ADDRESS.

THANK YOU.



ALONZO MOREFIELD, JR.
LITIGATOR.

/Anyk.

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY
2007 JUN 20 PM 2:12

ALONZO MOREFIELD, JR.
479955 GA-STARBRISON
2164 Hwy 147
Reidsville, GA. 30499

LEGAL
MAIL

Letter sent to Prison Mail Room
FBI 5 Ave - D & M A1005 ON
4/20/07. Check for 005 MARK
to ensure compliance
Requested 5/14/07 - received return mail 5/21/07

MELISSA ROTTENBERG, Clerk/Registrar
Circuit Court Montgomery County
Post Office Box 1667
Montgomery, AL 36102-1667

NOTICE: This envelope has been opened by the FBI. If you have information or knowledge of the identity of the sender, please contact the FBI at (202) 556-4600. If you have information or knowledge of the identity of the recipient, please contact the FBI at (202) 556-4600. If you have information or knowledge of the identity of the sender or recipient, please contact the FBI at (202) 556-4600. If you have information or knowledge of the identity of the sender or recipient, please contact the FBI at (202) 556-4600.

NOTE: SENDER HAS SEALED THIS Envelope. IF SEALING HAS BEEN
TAMPERED WITH, NOTIFY SENDER. GSP MAIL ROOM STAFF &
DO NOT OPEN OR ILLEGALLY OPEN LEGAL MAIL DAILY.

CV 07-991

State of Alabama Unified Judicial System Form ARCivP-93 Rev. 5/99	COVER SHEET CIRCUIT COURT - CIVIL CASE (Not For Domestic Relations Cases)	Case Number <div style="border: 1px solid black; padding: 2px;"> CV </div> Date of Filing: Judge Code: Month Day Year
GENERAL INFORMATION		
IN THE CIRCUIT COURT OF <u>MONTGOMERY COUNTY</u> , ALABAMA <u>ALONZO MOREFIELD, JR.</u> (Name of County) <u>GINA SAVAGE, WANDA ROBINSON, CAPT. B. PARNER-BYRD, MS. BROWN, F. DAVIS, P. HARRIS, DEBBY</u> <div style="display: flex; justify-content: space-between;"> <div> Plaintiff First Plaintiff <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other </div> <div> Defendant First Defendant <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other </div> </div>		
NATURE OF SUIT: Select primary cause of action, by checking box (check only one) that best characterizes your action:		
TORTS: PERSONAL INJURY <input type="checkbox"/> WDEA - Wrongful Death <input type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____ TORTS: PROPERTY INJURY <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Property OTHER CIVIL FILINGS <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Services	OTHER CIVIL FILINGS (cont'd) <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve <input checked="" type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	
ORIGIN (check one): <div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> INITIAL FILING <input type="checkbox"/> REMANDED </div> <div> <input type="checkbox"/> APPEAL FROM DISTRICT COURT <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT </div> <div> <input type="checkbox"/> OTHER: _____ </div> </div>		
HAS JURY TRIAL BEEN DEMANDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P. for procedure)		
RELIEF REQUESTED: <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
ATTORNEY CODE: Date <u>May 21, 2007</u> <div style="display: inline-block; vertical-align: middle;"> Signature of Attorney/Party filing this form </div>		
MEDIATION REQUESTED: <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNDECIDED		

NOTE:
Envelope sealed by Sender. FF Sealing
at top ↑ OK bottom & has been tampered
with notify Sender.

Court Name: U S DISTRICT COURT - AL/M
Division: 2
Receipt Number: 4602000254
Cashier ID: khaynes
Transaction Date: 08/29/2007
Payer Name: HASKELL SLAUGHTER YOUNG LLC

CIVIL FILING FEE
For: HASKELL SLAUGHTER YOUNG LLC
Case/Party: D-ALM-2-07-CV-000780-001
Amount: \$350.00

CHECK
Check/Money Order Num: 005287
Amt Tendered: \$350.00

Total Due: \$350.00
Total Tendered: \$350.00
Change Amt: \$0.00

ALONZO MOREFIELD, JR. V. GINA
SAVAGE ET AL